

EXHIBIT A

**Civil Rights Department**

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

February 3, 2025

Donald M. Falk
Four Embarcadero Center, Suite 1400
San Francisco, CA 94111

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202502-27987203
Right to Sue: Sanchez / United Airlines, Inc et al.

Dear Donald M. Falk:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, CRD will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department

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February 3, 2025

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202502-27987203

Right to Sue: Sanchez / United Airlines, Inc et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department

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February 3, 2025

Ruben Sanchez Jr.

AK

RE: Notice of Case Closure and Right to Sue

CRD Matter Number: 202502-27987203

Right to Sue: Sanchez / United Airlines, Inc et al.

Dear Ruben Sanchez Jr.:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective February 3, 2025 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Ruben Sanchez

CRD No. 202502-27987203

Complainant,

vs.

United Airlines, Inc
233 S. Wacker Dr.
Chicago, CA 60606

Association of Flight Attendants-CWA
501 3rd Street NW
Washington, DC

Respondents

1. Respondent **United Airlines, Inc** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming **Association of Flight Attendants-CWA** business as Co-Respondent(s).

3. Complainant **Ruben Sanchez Jr.**, resides in the City of [REDACTED] State of **AK**.

4. Complainant alleges that on or about **January 8, 2024**, respondent took the following adverse actions:

Complainant was harassed.

Complainant was discriminated against because of complainant's religious creed - includes dress and grooming practices, age (40 and over), other, association with a member of a protected class and as a result of the discrimination was terminated, asked impermissible non-job-related questions, denied any employment benefit or privilege, denied accommodation for religious beliefs, denied work opportunities or assignments.

1 **Complainant experienced retaliation** because complainant reported or resisted any form
2 of discrimination or harassment and as a result was terminated, asked impermissible non-
3 job-related questions, denied any employment benefit or privilege, denied accommodation
4 for religious beliefs, denied work opportunities or assignments.

4 **Additional Complaint Details:** On June 3, 2023, United received a complaint through its X
5 account that accused me of making comments on a flight on May 30, 2023, that I "hate
6 black people and am anti-trans." The allegations were not true and United's investigation
7 proved they were false. During that investigation, United asked me about a conversation I
8 had with a co-worker on that flight that related to our shared common Catholic faith related
9 to marriage and sexuality. United expressed disapproval of my religious beliefs, particularly
10 because they were made just before United began its observance of Pride Month in June.
11 Further, my union representative gave me the clear indication that she did not approve of
12 my religious beliefs.

9 Unable to terminate me based on the on-line complaint, United said it would review my
10 personal X account and identified a small handful of posts they claim were derogatory
11 toward the black community, transgender community, and passengers of size. Not only was
12 the characterization incorrect, but none of the posts had anything to do with United. As a
13 gay man, I do not approve of linking the transgender movement to the gay and lesbian
14 movement as they are distinct movements. My termination for my personal posts, reposts,
15 and even likes on X were merely a pretext for terminating me due to my religious beliefs
16 and/or age. United has a long history of hostility toward flight attendants based on their faith
17 and age. Indeed, courts have called out United's treatment of employees due to their
18 religious beliefs and United has a history of manufacturing reasons to terminate flight
19 attendants based on age. When I was terminated on January 8, 2024, I had been assigned
20 to United's hub in Los Angeles, CA.

15 My union, the Association of Flight Attendants -- Communications Workers of America, knew
16 my religious beliefs and for reasons unrelated to my case, chose to not take my grievance to
17 arbitration. They would allow me to proceed if I paid for it and hired my own lawyer,
18 something I could not afford. The union had no issue taking claims to arbitration for younger
19 employees and those with different religious beliefs. As a result, I was unable to complete
20 the arbitration to challenge United's retaliatory and discriminatory termination of my
21 employment based on pretextual grounds.

1 VERIFICATION

2 I, **Ruben Sanchez**, am the **Complainant** in the above-entitled complaint. I have read
3 the foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true. The same is true of my own
5 knowledge, except as to those matters which are therein alleged on information and
6 belief, and as to those matters, I believe it to be true.

7 On February 3, 2025, I declare under penalty of perjury under the laws of the State of
8 California that the foregoing is true and correct.

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